

# **EXHIBIT 64**

BRADLEY DEAN [Redacted for PII]

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, et al.,

Plaintiffs,

vs. CASE NO. 3:17-cv-00072-NKM

JASON KESSLER, et al.,

Defendants.

\*REVISED\*

REMOTE VIDEOTAPED DEPOSITION

OF

BRADLEY DEAN [Redacted for PII]

Reported by:

Greta H. Duckett, CCR, RPR, CRR, CVR-S, RVR-M-S

Job no. 180540

BRADLEY DEAN [Redacted for PII]

Remote videotaped deposition of

BRADLEY DEAN [Redacted for PII], taken before Greta H.

Duckett, Certified Court Reporter, Registered

Professional Reporter, Certified Realtime Reporter,

and Commissioner for the State of Alabama at Large,

on Thursday, June 11, 2020, commencing at

approximately 9:45 a.m.

1 BRADLEY DEAN [Redacted for PII]

2 ask you any information about your beliefs?

3 A. I was a pretty well-known personality  
4 by then, so (indiscernible).

5 Q. Did you have any involvement with  
6 recruiting new members?

7 A. I would suppose so. I mean, plenty of  
8 people from my blog have joined the group. Plenty  
9 of people I've interacted with on Twitter have  
10 joined the group -- on social media.

11 Q. So when you are recruiting a new  
12 member, what do you do to make sure that they share  
13 the beliefs of League of the South?

14 A. I think anyone can join, but, like, if  
15 people don't share the beliefs of the group, I  
16 think they're kicked out. But, you know, I don't  
17 run the group, so I don't know.

18 Q. Do new members undergo any form of  
19 vetting process?

20 A. I'm not in charge of that, so you would  
21 have to ask Dr. Hill.

22 Q. Are you aware if new members undergo  
23 any form of vetting process?

24 A. I think he said anyone could join, if  
25 I'm not mistaken. But, I mean, it's up to

1 BRADLEY DEAN [Redacted for PII]

2 there was the national group.

3 For a long time, each -- it was a very  
4 decentralized thing. And I think, in recent years,  
5 they've, you know -- they're just more of a  
6 national group than a state or local -- it seemed  
7 to be more state and local at the time. Now it's  
8 just, like, everyone who is a Southerner, and  
9 there's, like, a few guys who are at the top.

10 Q. So there -- were there leadership roles  
11 in the overall League of the South organization?

12 A. For example, Michael Tubbs is in charge  
13 of the Florida chapter. I'm pretty sure he still  
14 is.

15 Q. And did you have a leadership role?

16 A. No. They just asked me to talk to the  
17 media for them, I believe, around the time of the  
18 Pikeville rally, and I agreed. And they started  
19 calling me the public relations officer. And what  
20 I would do is I would talk to the media, and I  
21 would promote the -- promote events and interact  
22 with people on social media. But that was my --  
23 the only real role I had ever had except for being  
24 a member.

25 Q. Was that a formal position?

1 BRADLEY DEAN [Redacted for PII]

2 A. I think they said it was, but I just  
3 consider it I would talk to the media for them.

4 Q. Were you paid for that position?

5 A. No, I was not.

6 Q. When did that start?

7 A. Sometime in 2017, I believe.

8 Q. And --

9 (Simultaneous speakers.)

10 A. I mean, I did a lot of interviews with  
11 the press for the group. I talked to various  
12 reporters.

13 Q. Are you still the PR officer for League  
14 of the South?

15 A. I haven't done any -- I quit talking to  
16 the media a long time ago, so I don't -- I guess  
17 so, but it's, like, a -- really a defunct role at  
18 this point.

19 Q. Who asked you to be the PR officer?

20 A. I believe it was Tubbs or Dr. Hill, one  
21 of the two. But they just put me in charge of  
22 public relations because they thought I could talk  
23 to people and explain our world view. And --

24 (Simultaneous speakers.)

25 ///

1 BRADLEY DEAN [Redacted for PII]

2 these riots at Milo Yiannopoulos' speaking events.

3 And so, you know, it just seems to me, you know,

4 self-evident that when --

5 (Simultaneous speakers.)

6 MS. MUNLEY: Allegra, will you  
7 show tab number five? And this will be

8 Exhibit 4.

9 (Exhibit 4 was marked for  
10 identification.)

11 BY MS. MUNLEY:

12 Q. This is another post from your blog; is  
13 that correct?

14 A. That looks about right. Yeah. Yeah.  
15 That's me and my friend Tom.

16 Q. All right. I think Allegra is  
17 scrolling to what I want to talk about. It's  
18 number 8 here.

19 Do you see right here, where it says,  
20 I'm not opposed to preparation. By that, I mean  
21 arming yourself, training, gaining experience with  
22 firearms, developing your military skills with  
23 others.

24 Is that your position on the League of  
25 the South's development of a Southern Defense

1 BRADLEY DEAN [Redacted for PII]

2 Force?

3 A. I obviously believe that, you know,  
4 there's actually nothing wrong with practicing  
5 firearms or getting in better physical shape or  
6 working with others, you firing guns at the range.  
7 I don't believe, you know, there's anything wrong  
8 with that.

9 Q. But you agree that a Southern Defense  
10 Force was justified; is that correct?

11 A. Well, when violent anarchists -- from  
12 my view -- and this is -- this was around, I  
13 believe, February 2017 -- or January. This was at  
14 a time when --

15 (Simultaneous speakers.)

16 BY MS. MUNLEY:

17 Q. It's just a yes-or-no question.

18 A. Was it justified? I believe it was  
19 absolutely justified.

20 Q. Okay. Thank you.

21 (Simultaneous speakers.)

22 MS. MUNLEY: I think we're going  
23 to actually take a quick break. When  
24 we come back, I'm going to have maybe,  
25 like, 25 minutes of questions, and then



1 BRADLEY DEAN [Redacted for PII]

2 A. Pat? I don't think so.

3 Q. Did you have any specific  
4 responsibilities as the PR officer for League of  
5 the South?

6 A. Not that I really -- I think I was sent  
7 a handbook. I think they created a handbook last  
8 year. I haven't really read through it.

9 (Simultaneous speakers.)

10 A. And I haven't talked to the media  
11 anyway, so, like, I don't -- there's not much  
12 public relations to do when you're not talking to  
13 the media.

14 Q. And you used your blog, Occidental  
15 Dissent, to promote League of the South, primarily;  
16 is that correct?

17 A. Yes.

18 Q. Do you use any other platforms to  
19 promote League of the South?

20 A. At one point, Twitter, mainly.

21 (Simultaneous speakers.)

22 Q. Were you in charge of their Facebook?

23 A. No, I was not in charge of their  
24 Facebook.

25 Q. Do you know who was?

1 BRADLEY DEAN [Redacted for PII]

2 A. The alt-right -- the alt-right groups  
3 were using Discord to organize, you know,  
4 themselves for Unite the Right, whereas we mainly,  
5 you know, chatted -- our groups, which are not  
6 really -- the alt-right and Southern nationalism  
7 are not really the same thing. So our groups  
8 mainly, you know, just chatted through the phone  
9 like we usually do. But I got on the Discord to  
10 keep up with updates that the alt-right was posting  
11 for Unite the Right.

12 Q. And did you use Discord on behalf of  
13 League of the South?

14 A. No, not really.

15 Q. So when you posted on Discord, did  
16 people believe that was coming from League of the  
17 South?

18 A. I don't think so. I was really just  
19 speaking for myself and my blog.

20 Q. Have you ever reported to anyone about  
21 your Discord communications?

22 A. Have I ever what?

23 Q. Reported to anyone about your Discord  
24 communications, like to Michael Hill or anyone else  
25 at League of the South?

1 BRADLEY DEAN [Redacted for PII]

2 A. I don't believe so. I barely even  
3 checked the thing. I just mainly watched it to  
4 find out, like, how to get rides for people who  
5 were, you know, sending me messages on Twitter and  
6 email.

7 Q. Did you keep using it after Unite the  
8 Right?

9 A. For maybe a month or two. And then we  
10 noticed that, you know -- that people that  
11 Discord -- people on Discord were being doxed so we  
12 quit using the platform because it was insecure,  
13 although I never really used it to begin with. It  
14 was other people who were interested in that.

15 Q. And has the League of the South ever  
16 maintained a Discord channel?

17 A. If they have, I don't remember it. I  
18 don't think so. I don't think they ever really  
19 used Discord much.

20 Q. So you said that League of the South  
21 members generally communicate using the phone; is  
22 that correct?

23 A. Well, yeah. I mean, most of us have  
24 been activists for years, so we know each other in  
25 real life. So we would just chat on the phone

1 BRADLEY DEAN [Redacted for PII]

2 with, you know, friends. Whereas, people in the  
3 alt-right are mainly anonymous and didn't know each  
4 other in the real world, so they were much more  
5 focused on Discord at the time. But we barely --  
6 we were barely using that or even aware of it.

7 Q. And you said you also used Gab to post  
8 on behalf of League of the South; is that correct?

9 A. Yes. This was mainly after the big  
10 shuttering, as we call it, after everyone was  
11 banned from Facebook. And my Twitter account was  
12 banned in December of 2017 when Twitter changed the  
13 rules. And for about a year after that, I posted  
14 on Gab in 2018, I believe.

15 Q. And you -- but prior to that, you used  
16 Twitter primarily to communicate on behalf of  
17 League of the South; is that correct?

18 A. In 2017, yes. I had a pretty big  
19 Twitter account which I was trying to build up.  
20 And like I said, that Twitter account, like  
21 Occ Dissent, was banned when they changed the rules  
22 in December of 2017.

23 Q. The Twitter account you were using to  
24 communicate on behalf of League of the South, was  
25 that Occ Dissent?

1 BRADLEY DEAN [Redacted for PII]

2 A. -- had like two months to -- the  
3 federal and state government and the local  
4 government had two months to prepare for the rally.  
5 Our understanding was that it was going to be a sea  
6 of police there. And if they had made the  
7 slightest effort, they would have been able to keep  
8 order.

9 MS. MUNLEY: Allegra, will you  
10 show tab 13?

11 (Exhibit 18 was marked for  
12 identification.)

13 BY MS. MUNLEY:

14 Q. This will be Exhibit 18. Do you  
15 recognize this document?

16 A. That's correct. I wrote that on my  
17 blog.

18 Q. Okay. And you wrote this on  
19 August 31st, 2017; is that correct?

20 A. That sounds about right.

21 Q. Allegra is going to scroll for us.

22 You wrote, We brought about a dozen  
23 shields. They were designed to deal with any  
24 projectiles that we expected antifa to lob into the  
25 park, and a few of us brought pepper spray. But as

1 BRADLEY DEAN [Redacted for PII]

2 a whole, no one came in with sticks or any type of  
3 weapon; is that correct?

4 A. There was a debate before the rally  
5 whether we should bring guns or anything, and the  
6 debate was whether that has bad optics. And from  
7 what I know, we agreed that, as a group, we  
8 wouldn't come in armed, but individuals might, you  
9 know, come armed to protect (indiscernible); but as  
10 a group, not. So we were relatively more disarmed  
11 than usual at that rally. And like I said -- I  
12 said what I just told you. We brought shields  
13 because we anticipated that projectiles would be  
14 thrown into the park. But we trusted the police  
15 with our security, and that trust was misplaced.

16 Q. But people brought pepper spray; is  
17 that correct?

18 A. I believe some people did, yes.

19 Q. And you said that some people brought  
20 other weapons; is that correct?

21 A. I don't know. I can't speak for them.  
22 I didn't --

23 (Simultaneous speakers.)

24 BY MS. MUNLEY:

25 Q. You just said that some individuals

BRADLEY DEAN [Redacted for PII]

(Off-the-record discussion from  
2:05 p.m. to 2:23 p.m.)

THE VIDEOGRAPHER: The time is  
2:23 p.m. We're on the record.

BY MS. MUNLEY:

Q. So you arrived in Charlottesville on  
Friday afternoon; is that correct?

A. Yes. Yes.

Q. And you participated in the torchlight  
rally on Friday night?

A. Yes.

Q. You attended that as an observer for  
League of the South; is that correct?

A. No.

Q. Did you attend that with other League  
of the South members?

A. There were a few people there as  
individuals, but group had decided to stay behind  
that night.

Q. So how many of you from League of the  
South attended?

A. I'm not sure. I just know with me, it  
was just the people who were in -- who came with me  
to Charlottesville.

1 BRADLEY DEAN [Redacted for PII]

2 Q. And how many people was that?

3 A. Me, my wife, and four friends.

4 Q. So at least six people and potentially  
5 more people from League of the South attended,  
6 correct?

7 A. Well, I think two -- two of them, I  
8 don't think, were League of the South members.  
9 Maybe three, anyway.

10 Q. You-all came from the League of the  
11 South venue together; is that correct?

12 A. No. We had gone to a barbecue at  
13 another friend's house -- another friend's place.  
14 And I had talked to Jason Kessler, because I found  
15 out that evening that the -- the antifa had found  
16 out about the torchlight march, and I recommended  
17 to Jason that he shift the location of that march.  
18 But he called me back and said that he had talked  
19 to the police and everything was fine and good to  
20 go. And it was around that time that the court  
21 ruled in our favor that he had won his lawsuit and  
22 he could have the rally in the park the next day.

23 Q. But why did you recommend to  
24 Mr. Kessler to cancel the torch march?

25 A. Because I was concerned about antifa.



1 BRADLEY DEAN [Redacted for PII]

2 A. No.

3 Q. Did you see Michael Tubbs?

4 A. No.

5 Q. Did you see Michael Hill?

6 A. No.

7 Q. Thank you see Jack Schoep?

8 A. No.

9 Q. Did you see Augustus Sol Invictus?

10 A. Yes.

11 Q. What did you bring with you to the  
12 torch march?

13 A. We had some torches, but we were late  
14 getting there. It was halfway over. And some of  
15 my friends had torches who came with me, but I  
16 didn't have one.

17 Q. Where did you get the torches from?

18 A. I think a Dollar General.

19 Q. On the way to the torch march?

20 A. I believe we already had them.

21 Q. So you brought them from Alabama?

22 A. I believe so.

23 Q. And why did you bring a torch?

24 A. We knew that there was going to be a  
25 torch march and the alt-right was doing that; but

1 BRADLEY DEAN [Redacted for PII]

2 point, in my view. I caught up to the back of the  
3 line.

4 Q. So you did not carry a torch; is that  
5 correct?

6 A. No. My wife did, I believe.

7 Q. Did everybody in your group bring the  
8 lighter fluid for their tiki torches?

9 A. I'm not exactly sure. I wasn't the one  
10 who bought them, and I didn't light it.

11 Q. What did you wear to the torch march?

12 A. I believe I bought a new polo from my  
13 friend Kyle at the barbecue. It was a -- it was a  
14 new League of the South polo. I got it from him  
15 just a moment before.

16 Q. What color was it?

17 A. It was a black one, I think.

18 Q. And were other people wearing black  
19 polos?

20 A. Not really. It was an all-white event.

21 Q. Was there an instruction given to wear  
22 a white polo?

23 A. If there was, I didn't notice. It was  
24 really Identity Evropa that did that. That was  
25 their group.

1 BRADLEY DEAN [Redacted for PII]

2 down monuments, like in Richmond last night.

3 Q. Does it refer to non-white people  
4 replacing white people?

5 A. I think they were referring -- I think  
6 it's more than that. I think it's a total  
7 destruction and erasure of identity, and it isn't  
8 so much about non-whites as it is destroying our  
9 culture and identity, is my understanding.

10 Q. And did you chant, "You will not  
11 replace us" with the torch rally?

12 A. I don't recall chanting anything. I'm  
13 not a chanter.

14 Q. Did the marchers chant, "Jews will not  
15 replace us"?

16 A. I believe some of them did.

17 Q. Does this refer to Jewish people  
18 replacing white people?

19 A. It refers to Jewish people attacking  
20 Southern monuments, American -- monuments to  
21 American history. There's a long thread on Twitter  
22 today about someone -- a self-identified Jewish  
23 person who has a hit list of all kinds of monuments  
24 which need to be destroyed. So that's the kind of  
25 people they were responding to.

1 BRADLEY DEAN [Redacted for PII]

2 Q. Did the marchers chant, "Blood and  
3 Soil"?

4 A. Some of them did.

5 Q. Were these statements intended to be  
6 intimidating to non-white people?

7 A. I don't think so. Most nations in the  
8 world are based on ethnicity, not citizenship.

9 Q. So your testimony is that a large mass  
10 of people carrying torches, chanting "You will not  
11 replace us" is not -- was not intended to be  
12 intimidating to non-white people; is that correct?

13 A. Torch marches are common in Europe and  
14 are common in American history.

15 Q. (Indiscernible.)

16 A. I did not see it as intimidating. I  
17 thought it was a celebration of our identity.

18 Q. Were these statements intended to be  
19 intimidating to Jewish people?

20 A. I don't think so.

21 Q. All right. Did the marchers also  
22 chant, "Into the oven"?

23 A. I didn't hear that one.

24 Q. So is it your testimony that a large  
25 mass of people carrying torches, chanting "Jews

BRADLEY DEAN [Redacted for PII]

REPORTER'S CERTIFICATE

I, Greta H. Duckett, Certified Court Reporter, Registered Professional Reporter, and Certified Realtime Reporter, hereby certify that on Thursday, June 11, 2020, I reported the deposition of BRADLEY DEAN [Redacted for PII], who was first duly sworn or affirmed to speak the truth in the matter of the foregoing cause, and that the pages herein contain a true and accurate transcription of the examination of said witness by counsel for the parties set out herein.

I further certify that I am neither of kin nor of counsel to any of the parties to said cause, nor in any manner interested in the results thereof.

This 17th day of June, 2020.

*Greta H. Duckett*

GRETA H. DUCKETT, RPR, CRR, CVR-S, RVR-M-S  
ACCR-12, GCCR-2891, MCCR-1945, TNLCR-671  
Commissioner, State of Alabama at Large  
CCR EXPIRATION: 9/30/20  
MY COMMISSION EXPIRES: 5/17/21